

RESPONSE TO COMMENTS SUMMARY—March 24, 2004
SAN BERNARDINO COUNTY STORMWATER PROGRAM
MODEL WATER QUALITY MANAGEMENT PLAN GUIDANCE

Commenting Party	Draft WQMP Page	Comment	Response
RWQCB	N/A	I.01. General comment on the process of developing the WQMP. The San Bernardino (SB) County Program should have modeled their WQMP much more closely on the (now approved) Orange County WQMP.* “The permittees could have saved a significant amount of resources by using the Orange County WQMP as a guide for the program. However, it appears that the WQMP that was submitted by the permittees did not benefit much from the approved Orange County WQMP. The submitted plan neither meets the goals and objectives of the WQMP specified in the Permit (Permit = Order No. R8-2002-0012) nor has it included appropriate sections of the Orange County WQMP. This forces us and other interested parties to dedicate considerable amount of resources to review and comment on the inadequacy of the submitted WQMP.”	The SB County Program developed the submitted WQMP draft in good faith. The process began before the Orange County WQMP was finalized, and began with a focus on the MS4 Permit requirements. The Subcommittee tasked with developing the WQMP was aware of the Orange County efforts, and adopted some of the approach. The resources required to review program documents, such as the WQMP, are a necessary part of the process. The SB County Program appreciates the effort that went into the review and comment process.
NRDC	N/A	General comment that the Model WQMP is not consistent with the “standards” set by the approved Orange County WQMP.*	See above response to RWQCB comment I.01.
RWQCB	N/A	I.02. General comment. “We had also recommended that all stakeholders be invited to participate in the WQMP development process from the early stages of the process. However, the comments received from NRDC and Defend the Bay indicate that there was only limited public participation.”	We invited stakeholders into the process as soon as we had a relatively complete WQMP, and the Subcommittee had developed a reasonable consensus on what it should include.
RWQCB	N/A	I.03. General Comment: “An inherent weakness in considering individual projects as they are proposed at different times and at scattered locations is that the	The SB County Permittees are working to comply with the new development requirements of the Permit. The March 24, 2003 WQMP draft contains more details on evaluating

		management plan prescribed for any one site occurs in isolation from other watershed sites and activities. A WQMP should consider the cumulative impacts of all the projects...If the permittees are not considering storm water impacts during the planning process, and through each stage of the project, it may not be possible to implement cost-effective programs for the various stages of the project and to consider the cumulative impacts resulting from various projects within the watershed.”	cumulative impacts from projects.
RWQCB	N/A	I.04. General comment: “The WQMP should be developed in conjunction with the Permit requirements and the commitments made by the permittees in the Report of Waste Discharge (ROWD), including the Municipal Storm Water Management Program (MSWMP). It appears that the permittees have not considered the commitments made in the MSWMP in developing the WQMP.”	The WQMP addresses all requirements in the ROWD, the MS4 Permit, and the existing “Guidelines for New Development and Redevelopment.”
RWQCB	E-1	<p>II.2. a. Page E-1, first paragraph, second and third sentences: The Permit requires the WQMP to address pollutants from all phases of a new development and significant redevelopment project, not merely post-construction best management practices (BMPs).</p> <p>b. Page E-1, 2nd paragraph, the first bulleted item: Please note that the best available technology (BAT) and best conventional technology (BCT) standards are applicable to all phases of construction.</p> <p>c. Page E-1, 2nd paragraph, the bulleted items: We recommend that the following be added (second bulleted item is a revision) to the list of items.</p> <p>The project shall consider low impact development principles in the use of site design BMPs (refer to pages 2-</p>	<p>a. WQMPs are not required to address construction activities, as these are regulated by a separate statewide general stormwater permit, and local ordinances.</p> <p>b. This language will not be included. At the March 8, 2004 meeting with the representative from CICWQ, it was agreed that the Model WQMP would not refer to MEP, BAT, or BCT, but would instead require compliance with all requirements in the MS4 Permit (which contains reference to the applicable standards of MEP, BAT and BCT).</p> <p>c. The WQMP now contains more language requiring the consideration of Site Design BMPs (which are inferred to be “low impact”), and list the reference to “Low Impact Development Design Strategies” (1999).</p>

		<p>11 to 2-13).</p> <p>The discharge of any listed pollutant to a water body listed on the 303(d) list shall not cause or contribute to a lowering of water quality standards which include water quality objectives, beneficial uses, and the State's policy on anti-degradation.</p> <p>The discharge of any listed pollutant to an impaired water body on the 303(d) list shall require an offset (e.g., no net loading) for any additional loading from the proposed project to ensure no further degradation of the impaired water body.</p> <p>d. Page E-1, last paragraph, last two sentences: Please note that once the WQMP is approved, it becomes an enforceable part of the Permit and it shall be applicable to all permittees. These two sentences must be revised to reflect this.</p>	<p>The suggested language was not added because this requirement is explicit in the MS4 Permit.</p> <p>Offset requirements are included in the section on pollutants of concern (page 2-XX).</p> <p>d. Language revised—see page 1-1.</p>
CICWQ	E-1	Suggests the language regarding BAT and BCT be removed to be consistent with Orange County WQMP.*	BAT/BCT statement removed as explained in response to RWQCB comment II.2.b above.
RWQCB	1-1	<p>II.03. Section 1.1, Introduction, Page 1-1:</p> <p>a. All references to “post-construction BMPs” should be replaced with appropriate wording to include “all phases of a project” (see 2.a., above).</p> <p>b. The introduction should have more emphasis on design principles using low impact development.</p> <p>c. Bulleted items: Revise as per 2.c., above.</p>	<p>a. Not addressed—see response to comment II.2 above.</p> <p>b. Partially addressed in introduction—see new language--and addressed in other section.</p> <p>c. See response to II.2.c, above.</p>
RWQCB	1-1	<p>II.04. Section 1.2, Page 1-1:</p> <p>a. First Paragraph: We recommend that a WQMP be required for all new and redevelopment projects.</p>	<p>a. A WQMP will be required projects that do not fall into one of the 8 categories specified in the Permit (Section XII.B.1), but do have a precise plan of development or a subdivision of land</p>

		b. 1 st sentence: Please change the sentence structure to indicate that the project <u>proponents</u> must develop, submit, and implement a WQMP.	b. Revised—see new language, page 1-1.
NRDC	1-1	The Model fails to state that the discharge of any pollutant must not cause or contribute to an exceedance of any receiving water quality standard.*	This requirement is explicit in the MS4 Permit, and the Model WQMP now states that a project WQMP must “meet all the standards of compliance and any other requirements specified in the Permit.”
RWQCB	1-2	II.05. Section 1.3, WQMP Development Approach, Page 1-2: a. Figure 1-1, Step 1: We recommend requiring a WQMP for all projects. b. Steps 2, 3, 4 and 5: These steps should reference the appropriate tables and other attachments where this information is provided. c. Steps 5, 6 and 7: If the project proponent is proposing to participate in an approved regional water quality control program, that program must be identified. d. Page 1-3: Please indicate that a WQMP is also required for public agency projects.	a. See response to II.04.a, above. b. New language added--now Table 1-2. c. New language added--now table 1-2. d. New language added on page 1-5.
City of Ontario	Section 1	Change description for #4 in Table 1-1. Delete A-1 and A-2.	No change—direct MS4 Permit language. Revised to omit A-1.
RWQCB	2-1	II.6. Section 2.1, first bullet, Page 2-1: In many cases the project proponent is different from the property owner...Please require property owner information if different from owner of the project.	New language added—see page 2-1.
CICWQ	2-1	It is not possible for a project proponent to ensure that future successors will implement the WQMP.*	New language added—the project proponent must transfer the responsibility for WQMP compliance to the new owner—see page 2-1.
RWQCB	2-1	II.7. Section 2.2, Watershed Impact of Project: In addition to considering the project impact on the watershed, the cumulative impacts should also be considered. We also	New language and organization—see Section 2.2 and 2.3 and 2.4.

		recommend that this discussion be moved to the end of this subsection...	
RWQCB	2-1	<p>II.8. Section 2.2.1, Identify Pollutants of Concern, Page 2-1:</p> <p>a. Attachment C includes a discussion on pesticides, trash and debris and oxygen-demanding substances...please revise Table 2-1 to include these pollutants.</p> <p>b. First sentence, last paragraph, Page 2-1: It is not clear what is the “special consideration” required...</p> <p>c. First sentence, last paragraph, Page 2-1: Please replace the reference to “impairment of beneficial uses” with “impairment of water quality standards”.</p> <p>d.</p>	<p>a. New language added to Table 2-1.</p> <p>b. New language added—see page 2-2.</p> <p>c. New language added—see page 2-2.</p>
NRDC	2-1 & 2-2	<p>Generally asked for more details in the assessment of pollutants of concern and particularly objected to the “potential” designation in Table 2-1.*</p> <p>Also states that the Model fails to require consideration of all downstream waters in the POC determination.*</p>	<p>New language added and Table 2-1 substantially modified—see Section 2.2.</p> <p>New language added—see Section 2.2.</p>
RWQCB	2-2	<p>II.9. Section 2.2.2, Identify Hydrologic Conditions of Concern, Page 2-2:</p> <p>a. Second sentence in the 1st paragraph of this subsection states, “Under certain circumstances, changes could also result...eroding a downstream channel.” We recommend...in publications such as Start at the Source (1999) and Low Impact Development Design Strategies (1999). Section 2.3.2 has identified some of these ideas. One of the goals of the WQMP should be to maintain the geomorphic equilibrium in the channel.</p> <p>b. Section 2.2.2, Pages 2-2 and 2-3: The criteria (Criterion A and Criterion B) for determination of hydrologic conditions of concern seem to be predicated upon some non-existent documents. Please note that all the permittees do not have a Master Plan or other documents that fully address the cumulative hydrologic impacts of proposed projects (see Page 2-13, Table 2-2</p>	<p>a. The section on hydrologic conditions of concern has been substantially revised—see new language. We disagree with the suggested language regarding “geomorphic equilibrium.”</p> <p>b. See response to II.9.a, above.</p>

		of the 2002-03 Annual Report).	
NRDC	2-2 & 2-3	Generally objection to a lack of specificity and detail in this section.*	The section on hydrologic conditions of concern has been substantially revised—see new language in Section 2.3.
RWQCB	2-3	II.10. Section 2.3, Best Management Practices, Page 2-3: a. Please stress the importance of site design principles early on in the project. b. First paragraph, last sentence: Replace “an exceedance of receiving water quality objectives” with “an exceedance of water quality standards”. c. Last paragraph, last sentence: Only Table 2-2 is referenced for examples of required site design BMPs. Please include a reference to the site design BMPs listed on Pages 2-11 and 2-12.	a. New language added—see sections 2.5 and 2.5.1. b. Revised as suggested. c. Revised as suggested.
RWQCB	2-6	II.11. Page 2-6. Section 2.3.1, Site Design and Source Control BMPs: “For developments with POA...the POA provide environmental awareness education materials.” The project proponent should be responsible for the education materials where there is no POA or until the POA is established.	Revised as suggested.
CICWQ	2-6	2. Many listed Site Design and Source Control BMPs may not be feasible for a project, yet the WQMP appears to require them. There should be flexibility in choosing BMPs.*	New language added—see Section 2.5.
NRDC	2-6	It is not clear whether all listed Site Design BMPs are required for a project, or if they are optional. Also there is confusion as to what are Source Control and what are Site Design BMPs.* Specific comments on individual BMPs (storm drain signage, protection of slopes and channels, street sweeping requirements, and retail gas outlets).	The BMP section has been reorganized and new language was added to clarify the requirements—see Sections 2.5, 2.5.1 and 2.5.2. Some BMP descriptions were added or modified with new language (protection of slopes and channels added; street sweeping timing modified). Retail gas outlets are included in category 4 as specified in the MS4 Permit and therefore will require BMPs.

RWQCB	2-6	II.12. Page 2-6. Section 2.3.1, Site Design and Source Control BMPs – Administrative BMPs – Education for Property Owners, Tenants, and Occupants...it is a good idea to include copies of these brochures as attachments to the WQMP.	Permittees prefer to hand materials out as needed to ensure the most current versions are used.
RWQCB	2-6	II.13. Section 2.3.1, Page 2-6, Activity Restrictions, last sentence: Please note that the pesticide applicators are licensed by the Department of Pesticide Regulations and not by the Department of Food and Agriculture.	Correction made.
RWQCB	2-7	II.14. Section 2.3.1, Page 2-7, Design BMPs, Landscape Planning: a. Either a copy of the County Administrative Design Guidelines should be included with the WQMP as an attachment or indicate where a copy could be obtained. b. This section should include a discussion on hillside landscaping, especially protection of slopes. c. Landscape planning should consider designing a vegetative barrier...should also include discussion on using native and/or drought resistant plants.	a. Web availability information provided. b. Revised as suggested. c. New language added.
RWQCB	2-7	II.15. Section 2.3.1, Page 2-7, Design BMPs, Efficient Irrigation System: a. The irrigation systems should consider the use of flow reducers or shutoff valves triggered by a pressure drop to control water loss in the event of broken sprinkler heads or lines. b. Other devices described in the current New Development Guidelines...should be included in this discussion.	a and b: New language added.
RWQCB	2-7	II.16 Section 2. 3.1, Page 2-7 Insert provisions for protection of slopes and channels as follow (these are taken from the Orange County WQMP):	Suggested language inserted—see Section 2.5.1.2.
RWQCB	2-7	II.17. Section 2.3.1, Page 2-7, Storm Drain Signage: These signs must be maintained and a responsible party	New language added—see Section 2.5.1.2.

		for its maintenance should be identified in the WQMP.	
RWQCB	2-8	II.18. Section 2.3.1, Page 2-8, Energy Dissipator: Add “Energy dissipators shall be installed in such a way as to minimize impact to receiving waters.” Riprap is the only design structure included here...A good reference for considering other measures is Ann Riley’s book that discusses alternatives to concrete (see following citation).	New language added—see Section 2.5.1.2.
RWQCB	2-8	II.19. Section 2.3.1, Page 2-8, Areas and Activity Control BMPs, Fueling Areas: a. “Spilled material within the fuel dispensing area must be prohibited from draining to the street or storm drain system.” The material should also be prohibited from draining off-site. b. Specify that fueling areas should drain to the project treatment control BMPs, prior to off-site discharge.	a and b: Revised as suggested.
RWQCB	2-9	II.20. Section 2.3.1, Page 2-9, Trash Storage Areas and Litter Control:	Revised as suggested.
RWQCB	2-9	II.21. Section 2.3.1, Page 2-9, Maintenance Bays and Docks:	Revised as suggested.
RWQCB	2-9	II.22. Section 2. 3.1, Page 2-9, Vehicle Washing Areas, First Paragraph, last sentence:	Revised as suggested.
CICWQ	2-9	3. The vehicle wash area requirement is beyond the MS4 Permit requirements and will disproportionately impact economically disadvantaged populations.*	Car washing is a pollutant source that must be addressed. We modified the requirement with a threshold of 10 dwelling units to trigger the requirement.
RWQCB	2-10	II.23. Section 2.3.1, Page 2-10, Outdoor Material Storage Area: Add the following language: “Any storm water retained within the containment structures must not be discharged to the street or to the storm drain system.”	Language not modified. Collected clean stormwater may be discharged. Polluted water of any kind is already prohibited under the MS4 and General Industrial Permits.

RWQCB	2-10	II.24. Section 2.3.1, Page 2-10, Outdoor Work Areas: “Where vehicle or equipment repair/maintenance occurs, impermeable berms, trench drains, or containment structures shall be provided around the repair area bays to eliminate or reduce spilled materials and wash-down waters from entering the storm drain system.” Add the following language: “Any storm water retained within the containment structures must not be discharged to the street or the storm drain system.	Language not modified. Collected clean stormwater may be discharged. Polluted water of any kind is already prohibited under the MS4 and General Industrial Permits.
RWQCB	2-10	II.25. Section 2.3.1, Page 2-10, Outdoor Processing Areas	Revised as suggested.
RWQCB	2-10	II.26. Section 2.3.1, Page 2-10, Street Sweeping Private Streets and Parking Lots:	Revised as suggested.
RWQCB	2-10	II.27. Section 2.3.1, Page 2-10, Wash Water Controls for Food Preparation Areas:	Revised as suggested.
RWQCB	2-11	II.28. Section 2.3.1, Page 2-11, Common Area Catch Basin Inspection:	Revised as suggested.
RWQCB	2-11	II.29. Section 2.3.2, Page 2-11. Site Design BMPs “Add the following language: These low impact design principles...include Start at the Source (1999), and Low Impact Development Design Strategies (1999). “	Revised as suggested.
RWQCB	2-11	II.30. Section 2.3.2.1, Page 2-11. Minimize Stormwater Runoff, Minimize Project’s Impervious Footprint, and Conserve Natural Areas: Rain gardens are another way to infiltrate water and may be applied on individual lots or larger areas.	Revised--rain gardens are now mentioned.
RWQCB	2-12	II.31. Section 2.3.2.1, Page 2-12, Maximize the permeable area: Add the following paragraph: “Runoff from developed areas may be reduced...Lower volumes and rates of runoff translate directly to lowering treatment requirements.	Revised as suggested.

RWQCB	2-12	II.32. Section 2.3.2.1, Page 2-12, Conserve natural areas: If the County has a Multi-species Habitat and Conservation Plan, it must be referenced here.	No change--there is no existing approved plan of this type.
RWQCB	2-14	II.33. Section 2.3.3, Page 2-14, Treatment Control BMPs: Delete the first paragraph and replace with the following paragraphs: “Minimizing a development’s detrimental effects on water quality...that must be addressed by Treatment Control BMPs. WQMP-required projects shall be designed to remove pollutants of concern from the municipal storm drain system to achieve the appropriate standard, as specified in the Third Term Permit...unless a waiver is granted to the project by the Agency, based on the infeasibility of any Treatment Control BMPs and participation in an offset program. Where approved regional or watershed management programs are available... public review and comments and may be presented to the Regional Board for consideration.”	New language added—see Section 2.5.3. Some suggested language was not accepted, for example, projects cannot be designed to “remove pollutants from the municipal storm drain system.” Projects can be designed to remove pollutants from runoff before it discharges to the MS4, or prevent pollutants from entering runoff. Language was added to clarify alternative treatment requirements. Regional treatment language was revised to incorporate the suggested language.
RWQCB	2-14	II.34. Section 2.3.3, Page 2-14, Treatment Control BMPs:	The suggested reference was already included.
RWQCB	2-14	II.35. Section 2.3.3, Page 2-14, Treatment Control BMPs:	New language added, new selection matrix added, more details added for groundwater protection.
CICWQ	2-14	4. The requirement to have functional BMP design capacity before phased work begins is beyond the requirements of the Permit.*	No change--this requirement is designed to prevent discharge to treatment BMPs before they are operational.
RWQCB	2-15	II.36. Section 2.3.3, Page 2-15, Flow Based Treatment Control BMPs and Volume Based Treatment Control BMPs: These sections need a better introduction for the discussions that follow.	New language added—see Sections 2.5.3.1 and 2.5.3.2.
RWQCB	2-15	II.37. Section 2.3.3, Page 2-15, Bioretention	Revised as suggested.

RWQCB	2-16	II.38. Section 2.3.3, Page 2-16, Infiltration Basin: Please include a brief description of pre-treatment BMPs.	New language added.
RWQCB	2-17	II.39. Section 2.3.3, Page 2-17, Infiltration Trench:	Correction made.
CICWQ	2-17	5. It is not the requirement of the project proponent to treat runoff from offsite areas.*	No change. The calculation method is specified in the CASQA BMP manual for New Development.
NRDC	2-18	Objection to use of the Rational Formula as presented for flow-based design calculation.*	The presentation of the rational formula now includes a table to determine when the Rational Formula is not appropriate. In cases where the Rational Formula is not recommended, the Unit Hydrograph method specified in the San Bernardino County Hydrology Manual must be used.
RWQCB	2-18	II.40. Section 2.3.3.1, Page 2-18: Volume Based Design: Please include sample calculations in an attachment or appendix.	Sample calculations will be included when the new hydrologic curves are inserted.
NRDC	2-19	The section on equivalent treatment control alternatives requires more specificity regarding when equivalent treatment would be used, how to determine feasibility, and requirements for RWQCB notification.*	New language added—see Section 2.5.4.
RWQCB	2-19	II.41. Section 2.3.4, Page 2-19, Equivalent Treatment Control Alternatives: a. Please provide an explanation of an equivalent off-site treatment control compared to regional or sub-regional treatment systems. b. The Guidance states that “...equivalent treatment may be provided off site when approved by the Agency,” and...constituents of concern. c. The Guidance should list conditions and circumstances...appropriate reporting requirement to Regional Board staff for co-permittee approval of an equivalent treatment system.	a, b, and c: New language added—see Section 2.5.4.

RWQCB	2-20	II.42. Section 2.4, Page 2-20, Operations and Maintenance:	New language added—see Section 2.6. Maintenance mechanism examples are provided in attachments.
CICWQ	2-20	6. The O & M requirements are beyond the requirements of the permit.*	Maintenance is essential to ensure BMP performance, and therefore warrants more detailed requirements.
RWQCB	2-20	II.43. Page 2-20: Include permit closeout requirements...Please refer to language from Orange County WQMP, Section 7.II-5.2.	New language from Orange County WQMP added.
City of Ontario	Section 2	Various corrections and additions suggested.	Suggestions were incorporated where possible. For BMP description modifications adding a roof requirement, this can be modified by individual Permittees and was not changed. A link to the County Administrative Guidelines is provided. Site Design BMP section has been revised.
RWQCB	3-1	II.44. Section 3, Page 3-1, Regional-Based Water Quality Control: Any regional or sub-regional water quality treatment control systems should be submitted to the Regional Board...In case of significant controversies, the Regional Board will conduct a public hearing.	New language added—see Section 3.
NRDC	3-1	Requirements for regional treatment options are not sufficiently specific or detailed, and the Model should adopt the approach used in the Orange County WQMP.*	New language added—see Section 3.
CICWQ	3-1	7. Regional treatment should be encouraged—use the approach in the Orange County WQMP.*	New language added—see Section 3.
RWQCB	4-1	II.45. Section 4.1, Page 4-1, Changes in Site Development:	New language added—see Section 4.
RWQCB	4-1	II.46. Section 4.2, Page 4-1, Changes in Site Ownership: Include a discussion on how responsibilities for implementing the WQMP provisions will be transferred. Also, please include a template for an agreement between the current property owner and the new property owner for transfer of responsibility.	A template is not available, but we intend to develop a template and incorporate as an attachment by May 15, 2004.

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CICWQ	4-1	The transfer of ownership requirement is beyond the MS4 Permit requirements—especially recording the WQMP against the property title.*	No changes—a template for WQMP transfer will be developed.
NRDC	Attachments	The WQMP template was not previously available for review and comment. Various issues with incomplete information and inconsistent terms.*	We incorporated the suggested modifications directly, with the exception of the suggested new title of “Impact Identification.”
RWQCB	A-5	II.47. Section 1.1, Page A-5, Project Information:	Revised as suggested.
RWQCB	A-6	II.48. Section 3.1, Page A-6, Structural Control BMPs:	Selection table revised as suggested.
RWQCB	A-7	II.49. Section 3.2, Page A-7, Site Design BMPs: The site design principles should be listed....	A site design table has been added.
RWQCB	A-7	II.50. Section 3.3, Page A-7, Treatment Control BMPs: a. “Complete the following table for Treatment Control BMPs.” Provide instruction on how to complete the table. For example, “check the box(es) of selected BMPs.” b. Provide detailed descriptions on the “location”, implementation, “installation, long-term O&M” of planned Treatment Control BMPs.	a. New language added. b. Unclear what is being asked/suggested—no changes made.
RWQCB	A-10	II.51. Section 4.1, Page A-10, O&M Description and Schedule: a. There are two Section 4.1. This section is either 4.1.3 or 4.2. Please revise. b. “Provide the party or parties that will be responsible for each BMP O&M.” c. Indicate that for each responsible party, information should include the responsible party’s name and address and a contact name and phone number.	a. Correction made. b. Unclear what is being asked/suggested—no changes made c. Revised as suggested.
RWQCB	A-10	II.52. Section 5.1, Page A-10, Funding: “Indicate funding sources or sources for O&M for this project.”... information should include the responsible	Revised as suggested.

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		party's name and address and a contact name and phone number.	
RWQCB	A-11	II.53. Section 6.1, Page A-11, Certification: In Section 6, or elsewhere in the document, define signatory qualifications...Please include the following language in the Certification....	New language added as suggested.
City of Ontario	Attachments	Minor corrections suggested.	Corrections made, except the deletion of "SUSMPs."
RWQCB	N/A	II.54. Please include a glossary of acronyms and terms used in the WQMP document.	A list of acronyms has been provided on page iii. We will consider the development of a glossary within the Development Subcommittee.
* Paraphrased comment.			
Acronyms: CICWQ—Construction Industry Coalition on Water Quality NRDC—Natural Resources Defense Council RWQCB—Regional Water Quality Control Board (Santa Ana Region)			